

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOTOROLA SOLUTIONS, INC.)	
)	
Plaintiff,)	
)	CASE NO. 1:17-cv-01972
v.)	
)	Honorable Franklin U. Valderrama
HYTERA COMMUNICATIONS)	Magistrate Judge Jeffrey Cummings
CORPORATION LTD.)	
)	
Defendants.)	
)	

DEFENDANT’S MOTION TO FILE UNDER SEAL

Pursuant to Local Rule 26.2 and the Stipulated Protective Order (Dkt. 87), Defendant Hytera Communications Corporation Ltd. (“Defendant” or “Hytera”) respectfully moves this Court for leave to file under seal Hytera’s Sur-Reply Regarding Its Motion to Extend Time to Produce Source Code (Dkt. No. 314) and the following Exhibits attached to the aforementioned Motion (collectively, the “Provisionally Sealed Documents”):

- Hytera’s Sur-Reply Regarding Its Motion to Extend Time to Produce Source Code
- **Exhibit A:** Official letter from a Chinese a Chinese governmental body discussing Hytera’s source code.
- **Exhibit B:** Certified English translation of the official letter from from a Chinese a Chinese governmental body discussing Hytera’s source code.

The Provisionally Sealed Documents contain information and documents designated by the Chinese governmental body as for “Internal Use Only” and is otherwise considered by the Chinese governmental body as confidential.

WHEREFORE, Defendant respectfully moves this Court to seal the Provisionally Sealed Documents, as requested herein.

Date: August 22, 2023

Respectfully submitted,

/s/ Todd R. Tucker

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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2023, the foregoing was served upon counsel of record by virtue of the Court's electronic filing system.

/s/ Todd R. Tucker

One of the attorneys for Defendants